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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

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11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 APPROXIMATELY \$10,000.00 IN  
U.S. CURRENCY, AND  
15 MONEY ORDER VALUED AT \$1,000.00  
IN U.S. CURRENCY,  
16 Defendants.

2:23-MC-00266-KJM-DB

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

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19 It is hereby stipulated by and between the United States of America and potential claimants Efren  
20 Pacheco and Freeway Packaging and Glass, LLC (“claimants”), by and through their respective counsel,  
21 as follows:

22 1. On or about April 12, 2023, claimants filed claims in the administrative forfeiture  
23 proceeding with the U.S. Postal Inspection Service with respect to the Approximately \$10,000.00 in U.S.  
24 Currency and a Money Order valued at \$1,000.00 in U.S. Currency (hereafter “defendant funds”), which  
25 were seized on February 8, 2023.

26 2. The U.S. Postal Inspection Service has sent the written notice of intent to forfeit required  
27 by 18 U.S.C. § 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a  
28 claim to the defendant funds under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants has

1 filed a claim to the defendant funds as required by law in the administrative forfeiture proceeding.

2       3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
3 forfeiture against the defendant funds and/or to obtain an indictment alleging that the defendant funds are  
4 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
5 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
6 That deadline was July 11, 2023.

7       4. By Stipulation and Order filed on July 11, 2023, the parties stipulated to extend to October  
8 10, 2023, the time in which the United States is required to file a civil complaint for forfeiture against the  
9 defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to forfeiture.

10      5. By Stipulation and Order filed on October 12, 2023, the parties stipulated to extend to  
11 January 8, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
12 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
13 forfeiture.

14      6. By Stipulation and Order filed on January 10, 2024, the parties stipulated to extend to  
15 March 8, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
16 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
17 forfeiture.

18      7. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to further extend  
19 to June 6, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
20 against the defendant funds and/or to obtain an indictment alleging that the defendant funds are subject to  
21 forfeiture.

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1       8. Accordingly, the parties agree that the deadline by which the United States shall be  
2 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
3 alleging that the defendant funds are subject to forfeiture shall be extended to June 6, 2024.

4 Dated: 3/4/2024

PHILLIP A. TALBERT  
United States Attorney

5 By: /s/ Kevin C. Khasigian  
6 KEVIN C. KHASIGIAN  
7 Assistant U.S. Attorney

8 Dated: 3/4/2024

9 /s/ Jacek W. Lentz  
10 JACEK W. LENTZ  
11 Attorney for potential claimants  
Efren Pacheco and  
Freeway Packaging and Glass, LLC

(Signature authorized by email)

12  
13 ORDER

14       The parties' stipulated agreement is approved. The deadline by which the United States shall be  
15 required to file a complaint for forfeiture against the defendant funds and/or to obtain an indictment  
16 alleging that the defendant funds are subject to forfeiture shall be extended to June 6, 2024. Any future  
17 request to extend this deadline must be accompanied by a showing of good cause.

18       **IT IS SO ORDERED.**

19 DATED: March 8, 2024.

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21 CHIEF UNITED STATES DISTRICT JUDGE